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Attorney for Debtor(s)**

IN RE:

**MICHAEL P. SULLIVAN and
KRISTEN A. SULLIVAN**

Debtor

**: UNITED STATES BANKRUPTCY COURT
: DISTRICT OF NEW JERSEY
:
: CHAPTER 13
: CASE NO.: 12-25363/GMB
:
: NOTICE OF MOTION TO REOPEN
: TO ADMINISTER CHAPTER 7 ASSET
: CASE
:
: RETURN DATE:
: TIME:
: ORAL ARGUMENT REQUESTED**

**TO: Brian Thomas, Chapter 7 Trustee
327 Central Ave., Ste. 103
Linwood, NJ 08221**

**United States Trustee
Jeffrey Sponder
One Newark Center, Ste. 2100
Newark, NJ 07102**

All creditors on proof of service

PLEASE TAKE NOTICE that the undersigned Attorney for the Debtor shall move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, 401 Market Street, Camden, New Jersey on the ____ day of May, 2014 at 10:00AM or as soon thereafter as counsel may be heard for a Motion to Reopen to Administer Chapter 7 Asset Case.

The movant shall rely on the annexed Certification in support of the requested Order.

Oral argument of the Motion are hereby waived unless an Answer is timely filed by the responsive party at least seven (7) days prior to the return date hereof.

As the within Motion requests to reopen the debtor's case and the facts and/or law relied upon do not present complicated or unique questions, it is hereby submitted that no brief is necessary.

WIZMUR & FINBERG, LLP
Attorneys for Debtor

DATED: April 28, 2014

/s/ Joni L. Gray
Joni L. Gray, Esq.